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November 29, 2007

BY FAX: 212-805-6390

Hon. William H. Pauley III, District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Emmanuel Oruche*, 07 Cr. 0124 (WHP).

Dear Judge Pauley:

As counsel to defendant Emmanuel Oruche in the above action, we request a 2-week extension of the time within which to submit motions, and a concomitant extension of the other motion deadlines. Defense motions are currently due November 30th, the government's responses are due December 20th, replies are due January 4, 2008 and oral argument is set for January 18th. Jury selection is set for March 3, 2008. We believe the extension requested need not have any effect on the trial date, and may not even require an adjustment of the oral argument date.

Our request for an extension is necessary so we can review new discovery, which we just received yesterday, November 28th, before filing our motions. The government informed counsel by letter faxed Monday evening that additional discovery was available to be picked up from the U.S. Attorney's office. We were unable to pick it up on Tuesday, but yesterday morning retrieved a large box containing over 2200 pages of new discovery, principally documents seized from our client's office and computer hard drives, and DEA reports of investigation regarding the computer drives. The new discovery also includes 36 DVDs containing the contents of the computer drives, which, so far, we and co-counsel have been unable to open on our computers. We have spoken with the government about the problem and they are checking to see whether the discs are defective or whether the problem is with our computers.

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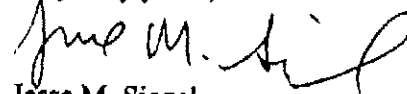
The new discovery bears directly on our motions. Since the documents and drives were seized from our client's place of business, they may be the subject of a motion to suppress. Clearly, now that it has been provided, we are obligated to review the evidence seized before making such a motion. Moreover, the discovery contains evidence which may affect the substance of our motions.

We have spoken with all counsel in the case. Jeremy Gutman, counsel to co-defendant Rebecca Ambo Fomum Tibah, and Ann Marie Hassett, counsel to co-defendant Paul Osuji, do not object to our request. Eric Meyer, counsel with Andrew Ceresny to co-defendant Joseph Oluigbo, does not oppose our request provided it can be accommodated without changing the trial date. A.U.S.A. Joseph Facciponti does not oppose our request so long as the government's date to respond is also extended two weeks, so the government has the same amount of time to respond as currently provided.

We submit our request can be accommodated by shortening the period we have to reply to the government's response from two weeks to one, and by adjourning the argument one week, to January 25th. Alternatively, other dates could be adjusted so argument can still take place January 18th.

Thank you for your attention to this application.

Very truly yours,


Jesse M. Siegel

cc. Jeremy Gutman, Esq. (By Hand)
Ann Marie Hassett, Esq. (By fax: 212-355-3333)
Eric Meyer, Esq. (By fax: 212-909-6836)
A.U.S.A. Joseph Facciponti (By fax: 212-637-2390)